

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

TODD WOLF,

Plaintiff

v.

Case No. 23-CV-149

CITY OF SHEBOYGAN, et al.,

Defendants.

**DEFENDANT RYAN SORENSON'S RESPONSES AND OBJECTIONS TO
PLAINTIFF TODD WOLF'S [NARROWED] INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

TO: Jennifer DeMaster
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NOW COMES Defendant Ryan Sorenson ("Defendant"), and provides the following responses to Plaintiff, Todd Wolf's Narrowed Second Set of Interrogatories (5-9) and Requests for Production of Documents (5-11), served January 25, 2024.

PRELIMINARY STATEMENT

The following answers, responses and objections have been prepared prior to the completion of Defendant's investigation, discovery, and preparation for trial in this action. They are based only on information, facts, and documents currently available and known to Defendant. Defendant has not yet completed his discovery or investigation in this matter. Accordingly, Defendant's answers to this Discovery is limited by the information which it has thus far located following a reasonable search and diligent inquiry. Defendant reserves the right to make changes to the answers and objections if it appears that omissions or errors have been made in them, or that

response to Plaintiff's Interrogatory No. 7 to Defendant City of Sheboygan, Request Nos. 7, 9, 20-23 to Defendant City of Sheboygan, Request No. 3 to Mary Lynne Donohue, and Interrogatory No. 7 to Defendant Filicky-Peneski, Interrogatory No. 4 to the Alderpersons and Request Nos. 4 and 8 to Defendant Adams for information that may be responsive to this Interrogatory/Request.

INTERROGATORY NO. 8: For any Request to Admit that was denied partially or in any manner, state the exact reasons for your denial listing all facts relevant to any denial.

ANSWER: Plaintiff made no revision to this Interrogatory.

Defendant Sorenson further objects to Interrogatory No. 8 on the grounds that it is improper, not permitted by the rules, and is abusive, harassing, overly broad and unduly burdensome in that it exceeds the number allowed under Federal Rule of Civil Procedure 33(a)(1) which provides that a party shall not serve more than 25 Interrogatories, including all discrete subparts, on any other party. Plaintiff has already propounded in excess of 25 Interrogatories on Defendant Sorenson.

Defendant Sorenson refers Plaintiff to his responses to each Request for Admissions for information responsive to this Interrogatory.

INTERROGATORY NO. 9: Describe who was or is responsible for day-to-day overseeing of personnel matters and/or human resources matters, including internal investigations and/or claims of harassment and discrimination, between *November 8, 2022 – April 10, 2023 or whether that was you*. For your response, describe (1) the officials responsible (their full name), (2) approximate dates they managed human resources matters or internal complaints, including yourself if you are responsible for reviewing and handling internal complaints from city employees or personnel, and (3) if you are not responsible for handling internal complaints, state which person you would refer people to file any internal complaint. *For this request, "personnel" is defined as internal employee or staff matters for all staff and employees of the City of Sheboygan.*

ANSWER: Defendant Sorenson objects to Interrogatory No. 9 on the grounds that it is improper, not permitted by the rules, and is abusive, harassing, overly broad and unduly burdensome in that it exceeds the number allowed under Federal Rule of Civil Procedure

33(a)(1) which provides that a party shall not serve more than 25 Interrogatories, including all discrete subparts, on any other party. Plaintiff has already propounded in excess of 25 Interrogatories on Defendant Sorenson.

Defendant Sorenson objects to this Interrogatory to the extent that it is overly broad in subject matter. As written, this Interrogatory seeks information that is not relevant to the claims and defenses in the above-captioned cause of action. The information requested is not relevant to Plaintiff's First Amendment prior restraint claim, violation of his due process property and liberty interests claims against Defendant Sorenson. The relevant time period for the claims asserted against Defendant Sorenson is November 7, 2022 – January 9, 2023.

Subject to and without waiving his objections, Defendant Sorenson states from November 8, 2022, until a new City Administrator was hired, the Common Council, City of Sheboygan directors and staff members assisted as needed with overseeing personnel and human resources matters. Defendant Sorenson affirmatively states that at year end, he drafted performance evaluations and issued them to directors. On January 16, 2024, Adam Westbook was confirmed to the Human Resources Director position and began directing the human resources work that had been being handled by human resources staff and the finance department staff.

VERIFICATION

I, Ryan Sorenson, do hereby verify, certify and state that the factual information contained in the foregoing responses to Plaintiff, Todd Wolf's Narrowed Second Set of Interrogatories (5-9) and Requests for Production of Documents (5-11), served January 25, 2024 are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink that reads "Ryan Sorenson". The signature is written in a cursive, flowing style.

Ryan Sorenson